

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

CASTELLA IMPORTS INC.

Opposer,

v.

INTERNET PROMISE GROUP®, LLC

Applicant

Opposition No. 91225825

Mark: A COMPANY LIKE NO OTHER ON THE
PLANET

Application Ser. No.: 86/253,027

Published in *Official Gazette*: September 15, 2015

Filed: April 15, 2014

APPLICANT'S ANSWER
TO NOTICE OF OPPOSITION DATED 01-13-2016

Honorable Commissioner of Trademarks
P O Box 1451
Alexandria, VA 22313-1451

Opposer **Castella Imports Inc.** having filed a Notice of Opposition dated 01/13/2016, stating grounds of opposition as, priority and likelihood of confusion, Applicant, **Internet Promise Group LLC** for the Mark: A COMPANY LIKE NO OTHER ON THE PLANET, application serial number 86/253,027, files the following answer:

The Applicant's Answer is timely filed as having been filed by February 22, 2016.



02-22-2016

U.S. Patent & TMO/c/TM Mail Rcpt Dt. #22

Applicant's Answer provides answers to each and every numbered paragraph averments of the Opposer and in addition alleges Affirmative Defenses.

Opposition Paragraph #1

Applicant denies these averments as having no knowledge or information sufficient to form a belief.

Opposition Paragraph #2

Applicant denies these averments as having no knowledge or information sufficient to form a belief.

Opposition Paragraph #3

Applicant denies these averments, as having no knowledge or information sufficient to form a belief. Applicant denies that Applicant had filed any application with the identified mark as alleged.

Opposition Paragraph #4

Applicant denies these averments.

Opposition Paragraph #5

Applicant denies these averments as having no knowledge or information sufficient to form a belief. Applicant denies that Applicant had filed any application with the identified mark as alleged.

Opposition Paragraph #6

Applicant denies these averments as having no knowledge or information sufficient to form a belief. Applicant denies that Applicant had filed any application with the identified mark as alleged.

Opposition Paragraph #7

Applicant denies these averments.

AFFIRMATIVE DEFENSES

Applicant alleges each and every Affirmative Defense as follows:

Applicant alleges Affirmative Defense of Unclean Hands.

Applicant alleges Affirmative Defense of Laches.

Applicant alleges Affirmative Defense of Fraud.

Applicant reserves the right to amend the Answer to plead additional and or different affirmative defenses based on the outcome of the discovery.

Wherefore, Applicant prays that the Notice of Opposition be quashed and the Applicant's Application Serial No. 86/253,027 be allowed to proceed to Notice of Allowance.

Respectfully submitted,

Date: February 17, 2016

By: /Tara Chand/
Tara Chand, President
Internet Promise Group LLC
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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First-class mail in an envelope addressed to:

ATTN: Trademark Trial and Appeal Board
Commissioner of Trademarks
P O Box 1451
Alexandria, VA 22313-1451

On February 17th, 2016
Date

/Tara Chand/
Signature

Tara Chand
Typed or printed name of person signing certificate

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing ANSWER TO NOTICE OF OPPOSITION Dated 01-13-2016 has been served on Ralph N. Gaboury, attorney for Opposer, by mailing said copy on February 17th, 2016, via First Class Mail postage prepaid to:

Ralph N. Gaboury
F. CHAU ASSOCIATES, LLC
Attorney for Opposer Castella Imports Inc
130 Woodbury Road
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Tel: 516 692 8888
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Tara Chand/
Tara Chand

Date: February 17th, 2016